

REMARKS

Claims 33-60 remain in the present application. Claims 33, 35-39, 41-45, 47-51, 53-56 and 58-60 are amended herein. Applicants respectfully submit that no new matter has been added as a result of the claim amendments. Applicants respectfully request further examination and reconsideration of the rejections based on the arguments set forth below.

Drawing Objections

The drawings are objected to as being informal. Formal drawings are submitted herewith. Accordingly, Applicants respectfully request withdrawal of the drawing objections.

Claim Rejections – 35 U.S.C. §102

Claims 33-34, 39-40, 45-46, 51-52 and 56-57 are rejected under 35 U.S.C. §102(e) as being allegedly anticipated by United States Patent Application Publication Number 2004/0048503 by Mills et al. (hereafter referred to as "Mills"). Applicants respectfully submit that the embodiments of the present invention as recited in Claims 33-34, 39-40, 45-46, 51-52 and 56-57 are neither anticipated nor rendered obvious by Mills for the following reasons.

Applicants respectfully direct the Examiner to independent Claim 33 that recites a method of copying files comprising (emphasis added):

storing a plurality of location identifiers, wherein said plurality of location identifiers comprises a location identifier of a removable memory, wherein said plurality of location identifiers further comprises a location identifier of a memory of a portable electronic device, and wherein said

removable memory is detachably coupled to said portable electronic device;

storing a file in a memory of said portable electronic device, wherein said file is associated with said location identifier of said memory;

displaying said plurality of location identifiers using a user interface of said portable electronic device;

in response to a user interaction with said user interface, associating said location identifier of said removable memory with said file, wherein said user interaction comprises a user selection of said file to copy, and wherein said user interaction further comprises a request to copy said file to said removable memory; and

in response to said associating said location identifier of said removable memory with said file, automatically copying said file from said memory of said portable electronic device to said removable memory.

Independent Claims 39, 45, 51 and 56 recite elements similar to independent

Claim 33. Claims 34, 40, 46, 52 and 57 depend from their respective

independent Claims and recite further elements of the claimed invention.

Applicants respectfully submit that Mills fails to teach or suggest the elements of "displaying said plurality of location identifiers using a user interface of said portable electronic device" as recited in independent Claim 33. As recited and described in the present application, a plurality of location identifiers are displayed using a user interface of a portable electronic device.

In contrast to the claimed embodiments, Applicants fail to find any teaching or suggestion in Mills of a user interface which displays a plurality of location identifiers as claimed. Additionally, Applicants fail to find any teaching or suggestion in Mills of a user interface *of a portable electronic device* which displays a plurality of location identifiers as claimed. Accordingly, Applicants reiterate that Mills fails to teach or suggest the elements of "displaying said

plurality of location identifiers using a user interface of said portable electronic device" as recited in independent Claim 33.

Applicants respectfully submit that Mills fails to teach or suggest the elements of "in response to a user interaction with said user interface, associating said location identifier of said removable memory with said file," "wherein said user interaction comprises a user selection of said file to copy" and "wherein said user interaction further comprises a request to copy said file to said removable memory" as recited in independent Claim 33. As recited and described in the present application, in response to a user interaction with a user interface of a portable electronic device, a location identifier of a removable memory is associated with a file stored on a memory of the portable electronic device. Additionally, the user interaction includes a user selection of the file to copy. Further, the user interaction also includes a request to copy the file to the removable memory.

In contrast to the claimed embodiments, Applicants fail to find any teaching or suggestion in Mills of associating a location identifier of a removable memory with a file in response to a user interaction with a user interface of a portable electronic device as claimed. Additionally, Applicants fail to find any teaching or suggestion in Mills of a user interaction which includes a user selection of the file to copy as claimed. Further, Applicants fail to find any teaching or suggestion in Mills of a user interaction which includes a user selection of the file to copy and also includes *a request to copy the file to the*

removable memory as claimed. Accordingly, Applicants reiterate that Mills fails to teach or suggest the elements of “in response to a user interaction with said user interface, associating said location identifier of said removable memory with said file,” “wherein said user interaction comprises a user selection of said file to copy” and “wherein said user interaction further comprises a request to copy said file to said removable memory” as recited in independent Claim 33.

Additionally, even assuming *arguendo* that “Mills teaches ‘PDA to provide user interface functions using the display and input devices of the PDA for controlling the storing and playback of digitally encoded media’” as stated on page 3 of the rejection, Applicants respectfully submit that Mills fails to teach a user interface which: displays a plurality of location identifiers as claimed; enables association of a location identifier of a removable memory with a file in response to a user interaction with a user interface of a portable electronic device as claimed; and enables a user interaction which includes a user selection of the file to copy and also includes a request to copy the file to the removable memory as claimed. Accordingly, Applicants reiterate that Mills fails to teach or suggest the elements of “displaying said plurality of location identifiers using a user interface of said portable electronic device,” “in response to a user interaction with said user interface, associating said location identifier of said removable memory with said file,” “wherein said user interaction comprises a user selection of said file to copy” and “wherein said user interaction further comprises a request to copy said file to said removable memory” as recited in independent Claim 33.

For these reasons, Applicants respectfully submit that independent Claim 33 is neither anticipated nor rendered obvious by Mills, and therefore overcomes the 35 U.S.C. §102(e) rejection of record. Since independent Claims 39, 45, 51 and 56 recite elements similar to those discussed above with respect to independent Claim 33, Applicants respectfully submit that independent Claims 39, 45, 51 and 56 also overcome the 35 U.S.C. §102(e) rejections of record. Since dependent Claims 34, 40, 46, 52 and 57 recite further elements of the invention claimed in their respective independent Claims, Applicants respectfully submit that dependent Claims 34, 40, 46, 52 and 57 are also neither anticipated nor rendered obvious by Mills. Therefore, Applicants respectfully submit that Claims 33-34, 39-40, 45-46, 51-52 and 56-57 are allowable.

Claim Rejections – 35 U.S.C. §103

Claims 35-38, 41-44, 47-50, 53-55 and 58-60 are rejected under 35 U.S.C. §103(a) as being allegedly unpatentable over Mills in view of United States Patent Number 7,003,327 to Payne et al. (hereafter referred to as "Payne"). Applicants respectfully submit that the embodiments of the present invention as recited in Claims 35-38, 41-44, 47-50, 53-55 and 58-60 are not rendered obvious by Mills in view of Payne for the following reasons.

Applicants respectfully submit that Payne, either alone or in combination with Mills, fails to cure the deficiencies of Mills discussed herein. More specifically, Applicants respectfully submit that Payne also fails to teach or

suggest the elements of “displaying said plurality of location identifiers using a user interface of said portable electronic device,” “in response to a user interaction with said user interface, associating said location identifier of said removable memory with said file,” “wherein said user interaction comprises a user selection of said file to copy” and “wherein said user interaction further comprises a request to copy said file to said removable memory” as recited in independent Claim 33.

Since Claims 35-38, 41-44, 47-50, 53-55 and 58-60 recite further elements of the invention claimed in their respective independent Claims, Applicants respectfully submit that dependent Claims 35-38, 41-44, 47-50, 53-55 and 58-60 are not rendered obvious by Mills in view of Payne. Therefore, Applicants respectfully submit that Claims 35-38, 41-44, 47-50, 53-55 and 58-60 are allowable.

CONCLUSION

Applicants respectfully submit that Claims 33-60 are in condition for allowance and Applicants earnestly solicit such action from the Examiner.

The Examiner is urged to contact Applicants' undersigned representative if the Examiner believes such action would expedite resolution of the present Application.

Please charge any additional fees or apply any credits to our PTO deposit account number: 50-4160.

Respectfully submitted,

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/BMF/

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